

February 28, 2023

Via ECF

Magistrate Judge Steven Tiscione
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Tanya Jackson et al. v. Queens Borough Public Library et al.*, 19-cv-6656-EK-ST

Dear Magistrate Judge Tiscione:

Plaintiffs Tanya Jackson and Center for Independence of the Disabled, New York and Defendants Queens Borough Public Library, the Board of Trustees of Queens Borough Public Library, and the City of New York (collectively, "the Parties") write jointly to provide the Court with a joint status report, pursuant to Your Honor's January 31, 2023, order.

Since the Parties' last joint status report on January 27, 2023, Defendants responded to Plaintiffs' last draft on February 2, and Plaintiffs responded to Defendants' February 2 draft on February 21. The Parties met to continue negotiations on February 23.

Defendants expect to respond to Plaintiffs' February 21 draft by March 6, and the Parties are scheduled to meet to continue their negotiations on March 20. Counsel expect to reach agreement on all settlement terms related to injunctive relief shortly, subject to all necessary approvals, and they will then negotiate terms related to Plaintiffs' attorneys' fees and costs. The Parties request that the next status update be due by March 30, 2023.

Sincerely,



Rebecca C. Serbin
Disability Rights Advocates
Attorney for Plaintiffs

/s/

Stephen Kitzinger
Office of Corporation Counsel
Attorney for Defendants